



## MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

14306 Park Avenue Victorville, CA 92392-2310  
760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

### PERMIT TO OPERATE

B008779

Operation under this permit must be conducted in compliance with all information included with the initial application, initial permit condition, and conditions contained herein. The equipment must be maintained and kept in good operating condition at all times. This Permit to Operate or copy must be posted on or within 8 meters of equipment. If a copy is posted, the original must be maintained on site, available for inspection at all times.

**EXPIRES LAST DAY OF: SEPTEMBER 2025**

#### OWNER OF OPERATOR (Co. #1531)

Mars Petcare US Inc.  
2013 Ovation Parkway  
Franklin, TN 37067

#### EQUIPMENT LOCATION (Fac. #2600)

Mars Petcare  
13243 Nutro Way  
Victorville, CA 92392

#### **Description:**

INGREDIENT HANDLING SYSTEM consisting of: Receiving systems, storage bins, hammermills, and related conveying system. Facility elevation is 2930 feet above sea level. Note: PM-10 emissions is limited to less than 93,437 pounds per year (46.72 TPY). It is noted that PM-10 emissions have been fully offset to this amount through a series of previous NSR activities pursuant to District Regulation XIII. All Dust Collectors associated with this Ingredient Handling System vent internally within their associated process buildings, with the exception of the following twelve dust collectors that vent directly to atmosphere: Filter Receivers Associated with the Raw Ingredient Transfer System: C014272 - Vents to Atmosphere and is located on the Roof of Batching Tower (3108); C014273 - Vents to Atmosphere and is located on the Roof of Batching Tower (3111); C014274 - Vents to Atmosphere and is located on the Roof of Batching Tower (3114), and C014275 - Vents to Atmosphere and is located on the Roof of Batching Tower (2387). Filter Receivers Associated with the Hammermills: C014276 - Vents to Atmosphere through the West Side of the Batching Tower (3411); C014277 - Vents to Atmosphere through the Roof of the Ventilation Tower (3421); C014278 - Vents to Atmosphere through the Roof of the Ventilation Tower (3431), and C014279 - Vents to Atmosphere through the Roof of the Ventilation Tower (3441). Filter Receivers associated with Hammermill Ingredient Transfers: C008764 - Vents to Atmosphere through the Roof of the Batching Tower, ground ingredient bins (211); C008769 - Vents to Atmosphere through the Roof of the Batching Tower, fine meal bins (412); C008770 - Vents to Atmosphere through the Roof of the Batching Tower, fine meal bins (462), and C009716 - Vents to Atmosphere through the Roof of the Batching Tower, fine meal bins (2412).

#### **EQUIPMENT**

Capacity	Equipment Description
0	Receiver (Load Out)
5.4	Fan (Receiver Load Out)
20.1	Train Reception Pit #3 New Hopper Drag Conveyor

Fee Schedule: 1 (d)      Rating: 4710.72bhp      SIC: 2047      SCC: 30200804      Location/UTM(Km): 474E/3817N

This permit does not authorize the emission of air contaminants in excess of those allowed by law, including Division 26 of the Health and Safety Code of the State of California and the Rules and Regulations of the District. This permit cannot be construed as permission to violate existing laws, ordinances, statutes or regulations of this or other governmental agencies. This permit must be renewed by the expiration date above. If billing for renewal fee required by Rule 301(c) is not received by expiration date above, please contact the District.

Mars Petcare US Inc.  
Attention: Gregg Elmore  
  
Victorville, CA 92392

By: **COPY**  
**Brad Poiriez**  
Air Pollution Control Officer

Capacity	Equipment Description
4	Train Reception Pit #3 Existing Hopper New Double Screw Conveyor
100.59	Train Reception Pit #3 New Central Filter Receiver Aspiration Fan
0.69	Train Reception Pit #3 New Central Filter Receiver Airlock #1
0.69	Train Reception Pit #3 New Central Filter Receiver Airlock #2
0.69	Train Reception Pit #3 New Central Filter Receiver Airlock #3
4	Train Reception Pit #3 New Central Filter Receiver Screw Conveyor
14.8	Truck and Train Reception Pit #2 & #3 Discharging Curve Drag Conveyor
20.1	Drag Conveyor discharging to South Tower Feed Bucket Elevator
14.8	Truck and Rail Receiving Transfer Bucket Elevator
5.4	Truck and Rail Receiving Transfer Bucket Elevator Scalper
5	Truck and Rail Receiving Transfer Bucket Elevator Drum Magnet
3	Truck and Rail Receiving Transfer Bucket Elevator Buffer Hopper Filter Receiver Exhaust Fan
4	Truck and Rail Receiving Transfer Bucket Elevator Buffer Hopper Discharge Rotary Airlock
469.39	Truck and Rail Receiving Transfer Pneumatic Pressure Blower
2	Truck and Rail Receiving Transfer Pneumatic Heat Exchangers #1
2	Truck and Rail Receiving Transfer Pneumatic Heat Exchangers #2
2	Truck and Rail Receiving Transfer Pneumatic Heat Exchangers #3
150	Pressure Blower (Truck - #2 Pit)
150	Pressure Blower (Truck - #1 Pit)
0.59	Train Reception Pit #3 New Central Filter Receiver Enclosure Fan
0	Truck Reception Pit #2 Filter Receiver
0	Train Reception Pit #3 New Central Filter Receiver
0	Truck Reception Pit #1 Filter Receiver
0	Truck and Rail Receiving Transfer Bucket Elevator Buffer Hopper Filter Receiver
5	Major Bins Infeed Filter Receiver Fan (Ground Grains)
125.08	Blower with silencer (396)
150.06	Blower with silencer (379)
150.06	Blower with silencer (backup for 379) (385)
2.68	Airlock
2.68	Airlock
2.68	Airlock
0.5	Bagged Ingredient Bins Feeding Distributor (8-Head)
5.36	Indoor Bulk Storage Bin #32 screw feeder
5	Rework Bins Infeed Filter Receiver #3 Fan
5	Rework Bins Infeed Filter Receiver #1 Fan
5	Rework Bins Infeed Filter Receiver #2 Fan
14.75	Coarse Meal Bins Filter Receiver Fan
4.019	Airlock
5.36	Rework/Scrap storage bin #30 screw feeder
14.75	Major Bin Receiving Filter Receiver #1 Exhaust fan
4.01	Major Bin Receiving Filter Receiver #1 Airlock
1	Indoor Bulk Storage Bin #15 Bin Vent Filter & Fan
14.75	Major Bin Receiving Filter Receiver #2 Exhaust fan
4.01	Major Bin Receiving Filter Receiver #2 Airlock
2	Airlock (Load Out)
14.75	Pre-Grind Ingredient Receiver Exhaust fan
40	Blower with Silencer (Minor Bagged Transfer System)
0.57	Primary Grinder New Feeder
2	Primary Grinder New Airlock
4.01	Pre-Grind Ingredient Receiver Airlock

Capacity	Equipment Description
7.37	Primary Grinder New Discharge Screw conveyor
0.5	Major Bin Receiving Filter Receiver #1 Distributor (6 Head)
5.36	Major Bin Receiving Filter Receiver #1 Drag Conveyor #1
60.35	Primary Grinder New Receiver Exhaust fan
384.87	Primary Grinder (a.k.a., Hammermill #1)
150.06	Pressure Blower (Truck - #2 Pit) (118)
150.06	Pressure Blower (Truck - #1 Pit) (2118)
0.5	Major Bin Receiving Filter Receiver #1 Distributor (6 Head)
0.57	Secondary Grinder #2 Feeder
0.57	Secondary Grinder #3 Feeder
0.57	Secondary Grinder #1 Feeder
2	Airlock
2	Airlock
2	Airlock
2	Secondary Grinder #1 Discharge Airlock
2.009	Secondary Grinder #2 Discharge Airlock
2	Secondary Grinder #3 Discharge Airlock
5.36	Major Bin Receiving Filter Receiver #1 Drag Conveyor #2
4.019	Major Bin Receiving Filter Receiver #1 Screw Conveyor #2
60.35	Secondary Grinder #1 Receiver Exhaust fan
60.35	Secondary Grinder #2 Receiver Exhaust fan
60.35	Secondary Grinder #3 Receiver Exhaust fan
125.08	Vacuum (2nd GRD 3)
125.08	Vacuum (2nd GRD 1)
125.08	Vacuum (2nd GRD 2)
384.87	Secondary Grinder #1 (a.k.a., Hammermill #2)
384.87	Secondary Grinder #2 (a.k.a., Hammermill #3)
384.87	Secondary Grinder #3 (a.k.a., Hammermill #4)
4.01	Major Bin Receiving Filter Receiver #1 Screw Conveyor #3
4.01	Major Bin Receiving Filter Receiver #1 Screw Conveyor #1
0.5	Major Bin Receiving Filter Receiver #2 Distributor (6 Head)
5.36	Beet Pulp & Whole Grain Bins Feeding Drag Conveyor #1
5.36	Beet Pulp & Whole Grain Bins Feeding Drag Conveyor #2
0.5	Beet Pulp & Whole Grain Bins Feeding Distributor (4 Head)
14.75	Pre-Grind Ingredient Infeed Drag Conveyor
2.95	Rework Bin #30 Infeed Drag Conveyor
0.5	Coarse Meal Bins Distributor (4 Head)
167.5	22 Bins for Major Ingredient Storage
31	6 Bin Vents serving the Major Ingredient Storage System (6 fans)
30	6 Bins for Whole Grain Storage System
25	5 Bin Vents serving the Whole Grain Storage System (5 fans)
0	7 Bins for Minor Ingredient Storage/Bagged Ingredient Storage (with filter sock vents)
32.5	10 Bins for Ground Grain Ingredient Storage
2	2 Bin Vents serving the Ground Grain Ingredient Storage System (2 fans)
15	4 Bins for Course Meal Storage (with filter sock vents)
30	7 Bins for Fine Meal Storage
3	4 Bin Vents serving the Fine Meal Storage System (4 fans)
19.5	8 Bins for Dry Rework Storage
1.5	2 Bin Vents serving the Dry Rework Storage Systems (2 fans)
150	Rework Transfer Blower Package (from extrusion)

Capacity	Equipment Description
2	Rework Transfer Airlock
30	Minor Ingredient Transfer Blower (367)
60	Fines Transfer System (3 Blowers @ 20 HP each)
1	Bagged Ingredient Receiving/Transfer to Mixer Fan (366.4)
10	Bagged Ingredient Receiving System & Bins (160/2361)
5	Bagged Ingredient Bins Filter Receiver Fan (169.1)
0	Bagged Ingredient Bins Filter Receiver (169)
0	Primary Grinding Transfer Filter Receiver (Ground Grains; 211)
0	Minor Ingredients Receiver (366)
0	Secondary Receiver (2nd grd 1; 412)
0	Secondary Receiver (2nd grd 2; 462)
0	Rework Bins Infeed Filter Receiver #1
0	Rework Bins Infeed Filter Receiver #2
0	Receiver (858)
0	Receiver (875)
0	Coarse Meal Bins Filter Receiver (2387)
0	Receiver (2nd grd 3)
0	Rework Bins Infeed Filter Receiver #3
0	Major Bin Receiving Filter Receiver #1 (3108)
0	Major Bin Receiving Filter Receiver #2 (3111)
0	Pre-Grind Ingredient Filter Receiver (3114)
0	Primary Grinder New Receiver Air filter (3411)
0	Secondary Grinder #1 Receiver (3421)
0	Secondary Grinder #2 Receiver (3431)
0	Secondary Grinder #3 Receiver (3441)

## CONDITIONS:

1.This equipment shall be installed, operated and maintained in strict accord with those recommendations of the manufacturer, supplier, and or sound engineering principles which produce the minimum emissions of contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.

[District Rule 1302]

1.This equipment shall be installed, operated and maintained in strict accord with those recommendations of the manufacturer, supplier, and or sound engineering principles which produce the minimum emissions of contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.

[District Rule 1302]

2.The owner operator shall conduct a minimum program of inspection and maintenance on this equipment, and maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, State or Federal personnel upon request:

- a. Monthly dust collector stack observation date and results, using EPA Method 22, and EPA method 9 if Method 22 detects visible emissions, or In lieu of Method 9, owner operator may cease operations until deficiencies contributing to opacity are corrected.
- b. Quarterly filter support system inspection date and results;
- c. Date of filter replacements, and,
- d. Date and nature of any system repairs.

[District Rules 1303]

2.The owner operator shall conduct a minimum program of inspection and maintenance on this equipment, and maintain current and on-site for five (5) years a log of the following information, which shall be provided to District, State or Federal personnel upon request:

- a. Quarterly process stack observation date and results, using EPA Method 22, and EPA method 9 if Method 22 detects visible emissions, or In lieu of Method 9, owner operator may cease operations until deficiencies contributing to opacity are corrected.
- b. Quarterly filter support system inspection date and results;

- c. Date of filter replacements, and,
  - d. Date and nature of any system repairs.
- [District Rules 1303]

3.The owner operator shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

- a. As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
- b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection (a) of District Rule 401 (20% opacity).

[District Rule 401]

3.The owner operator shall not discharge into the atmosphere from any single source of emission whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

- a. As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
- b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection (a) of District Rule 401 (20% opacity).

[District Rule 401]

4.This equipment shall not be operated unless the air pollution control devices with the following permits are in place and properly operating (as applicable): C008760, C008761, C008763, C008764, C008765, C008766, C008769, C008770, C008771, C008772, C009295, C009296, C009297, C009298, C009299, C009300, C009301, C009302, C009303, C009304, C009305, C009306, C009307, C009308, C009309, C009310, C009311, C009312, C009313, C009314, C009714, C009716, C009717, C009718, C009719, C014272, C014273, C014274, C014275, C014276, C014277, C014278, and C014279.

[District Rule 1302]

4.This equipment shall not be operated unless the air pollution control devices with the following permits are in place and properly operating (as applicable): C008760, C008761, C008763, C008764, C008765, C008766, C008769, C008770, C008771, C008772, C009295, C009296, C009297, C009298, C009299, C009300, C009301, C009302, C009303, C009304, C009305, C009306, C009307, C009308, C009309, C009310, C009311, C009312, C009313, C009314, C009714, C009716, C009717, C009718, C009719, C014272, C014273, C014274, C014275, C014276, C014277, C014278, and C014279.

[District Rule 1302]

5.The owner operator shall maintain on-site a minimum inventory of replacement bin vent bags, filters and/or cartridges that assures compliance with these conditions.

[District Rule 1302]

5.The owner operator shall maintain on-site a minimum inventory of replacement bin vent bags, filters and/or cartridges that assures compliance with these conditions.

[District Rule 1302]

6.The owner operator shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District personnel upon request:

- a. Monthly facility finished production, in pounds or tons, and
- b. Cumulative last-twelve-month facility finished production, in pounds or tons.

[District Rule 1302]

6.The owner operator shall maintain current and on-site for five (5) years a log of the following information, which shall be provided to District personnel upon request:

- a. Monthly facility finished production, in pounds or tons, and
- b. Cumulative last-twelve-month facility finished production, in pounds or tons.

[District Rule 1302]

7.This facility shall not produce more than 220,000 tons per year of finished product, calculated on a rolling twelve month basis, additionally, this facility shall not re-package more than 11,000 tons per year of finished product, calculated on a twelve month basis.

[District Rule 1302]

7. This facility shall not produce more than 220,000 tons per year of finished product, calculated on a rolling twelve month basis, additionally, this facility shall not re-package more than 11,000 tons per year of finished product, calculated on a twelve month basis.  
[District Rule 1302]

8. The entire facility shall not emit any of the Regulated Pollutants listed below in excess of the following limits in any consecutive 12 month period to remain below the USEPA's Synthetic Minor - 80% (SM-80) threshold:

- a. Oxides of Nitrogen (NO<sub>x</sub>): 20 tons per consecutive twelve (12) month period, measured as NO<sub>2</sub>;
- b. Oxides of Sulfur (SO<sub>x</sub>): 20 tons per consecutive twelve (12) month period;
- c. Volatile Organic Compounds (VOC): 20 tons per consecutive twelve (12) month period;
- d. Carbon Monoxide (CO): 80 tons per consecutive twelve (12) month period;
- e. Hydrogen Sulfide (H<sub>2</sub>S): 8 tons per consecutive twelve (12) month period;
- f. Lead (Pb): 0.48 tons per consecutive twelve (12) month period;
- g. Particulate Matter 10 microns and less (PM<sub>10</sub>): 46.72 tons (93,437 pounds - District Rule 1303(B) - basis: limit offset) per consecutive twelve (12) month period;
- h. Any single Hazardous Air Pollutant (HAP): 8 tons per consecutive twelve (12) month period; and,
- i. All HAPs combined: 20 tons per consecutive twelve (12) month period. Compliance with these limits shall be demonstrated through the submission of a facility-wide Comprehensive Emission Inventory (CEI) for all emitted Regulated Air Pollutants. Exceedance of these emission limits may trigger offsets, BACT, National Emission Standards for Hazardous Air Pollutants (NESHAP), and/or require submission of a Title V permit application.

[District Rules 1302 and 1303]

8. The entire facility shall not emit any of the Regulated Pollutants listed below in excess of the following limits in any consecutive 12 month period to remain below the USEPA's Synthetic Minor - 80% (SM-80) threshold:

- a. Oxides of Nitrogen (NO<sub>x</sub>): 20 tons per consecutive twelve (12) month period, measured as NO<sub>2</sub>;
- b. Oxides of Sulfur (SO<sub>x</sub>): 20 tons per consecutive twelve (12) month period;
- c. Volatile Organic Compounds (VOC): 20 tons per consecutive twelve (12) month period;
- d. Carbon Monoxide (CO): 80 tons per consecutive twelve (12) month period;
- e. Hydrogen Sulfide (H<sub>2</sub>S): 8 tons per consecutive twelve (12) month period;
- f. Lead (Pb): 0.48 tons per consecutive twelve (12) month period;
- g. Particulate Matter 10 microns and less (PM<sub>10</sub>): 46.72 tons (93,437 pounds - District Rule 1303(B) - basis: limit offset) per consecutive twelve (12) month period;
- h. Any single Hazardous Air Pollutant (HAP): 8 tons per consecutive twelve (12) month period; and,
- i. All HAPs combined: 20 tons per consecutive twelve (12) month period. Compliance with these limits shall be demonstrated through the submission of a facility-wide Comprehensive Emission Inventory (CEI) for all emitted Regulated Air Pollutants. Exceedance of these emission limits may trigger offsets, BACT, National Emission Standards for Hazardous Air Pollutants (NESHAP), and/or require submission of a Title V permit application.

[District Rules 1302 and 1303]

9. This facility shall emit less than 8 tons per year (tpy) of a single HAP and 20 tpy of all HAP's. To ensure compliance, the owner/operator shall calculate and record the annual emissions of Federal Hazardous Air Pollutants (HAP's) in tpy on a calendar year basis (January 1 through December 31). The list of HAP's can be found in Section 112(b)(1) of the Federal Clean Air Act or at web site: <http://www.epa.gov/ttn/atw/188polls.html>.

[District Rule 1302]

9. This facility shall emit less than 8 tons per year (tpy) of a single HAP and 20 tpy of all HAP's. To ensure compliance, the owner/operator shall calculate and record the annual emissions of Federal Hazardous Air Pollutants (HAP's) in tpy on a calendar year basis (January 1 through December 31). The list of HAP's can be found in Section 112(b)(1) of the Federal Clean Air Act or at web site: <http://www.epa.gov/ttn/atw/188polls.html>.

[District Rule 1302]

10. A facility wide Comprehensive Emission Inventory (CEI) for all emitted criteria and toxic air pollutants must be submitted to the District, in a format approved by the District, upon District request.

[District Rule 107(b); H&S Code 39607 & 44341-44342; and 40 CFR 51, Subpart A]

10.A facility wide Comprehensive Emission Inventory (CEI) for all emitted criteria and toxic air pollutants must be submitted to the District, in a format approved by the District, upon District request.  
[District Rule 107(b); H&S Code 39607 & 44341-44342; and 40 CFR 51, Subpart A]